

EXHIBIT A

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND**

KATIANA SOENEN, TAJA HIRATA-
EPSTEIN, CHLOE BURNS, EMMA
DENNIS-KNIERIEM, JANE DOES 1-2,
individually and on behalf of all others
similarly situated,

Plaintiffs,

v.

BROWN UNIVERSITY,

Defendant.

CLASS ACTION

C.A. No. 1:21-cv-00325-JJM-PAS

Jury Trial Demanded

**DECLARATION OF PLAINTIFF JANE DOE 1 IN SUPPORT
OF THE MOTION TO PROCEED UNDER A PSEUDONYM**

Pursuant to 28 U.S.C. § 1746, I hereby declare under penalty of perjury that the following is true and correct:

1. I am a plaintiff in the above-captioned lawsuit.
2. I joined this matter as a plaintiff via the First Amended Class Action Complaint (the “Amended Complaint”) filed on January 28, 2022.
3. This lawsuit involves sexual harassment perpetrated against me by a professor in the Applied Music Program (“AMP”) at Brown University (“Brown” or the “University”).
4. I am a current student at Brown and reside on campus in University housing.
5. I was enrolled in the AMP for the Fall 2021 and Spring 2021 semesters.
6. I first reported the sexual harassment perpetrated against me to Brown on or about November 11, 2020 and to Brown’s Title IX Office on or about March 30, 2021.
7. The sexual harassment perpetrated against me caused me to leave the AMP following the Spring 2021 semester to avoid being further harassed and to protect my safety.

8. I am requesting that this Court allow me to use the pseudonym “Jane Doe 1,” instead of my real name, for purposes of this litigation.

9. While this lawsuit relates to Brown’s mishandling of the sexual harassment perpetrated against me by a Brown professor, I have a significant interest in maintaining my privacy and avoiding any public association between myself and the professor.

10. Given the highly sensitive and personal nature of the sexual harassment perpetrated against me, I believe that proceeding with this lawsuit under my real name will have an immediate and irreparable effect on me and my reputation, future educational, and employment opportunities, and personal relationships.

11. My public identification would needlessly interfere with my efforts to process, cope with, and recover from the conduct described in the Amended Complaint. I am also concerned about my personal safety.

12. Because I am still a Brown student and currently reside on Brown’s campus, I am concerned that I may suffer retaliation and reputational harm if my true identity is revealed.

13. I also worry that my family will suffer severe emotional distress if my name is publicly disclosed.

14. I have taken great care to protect the nature of my claim and have not revealed my identity or otherwise sought publicity in this matter.

15. I declare under penalty of perjury that the foregoing is true and correct.

Executed on February 4, 2022

By: Jane Doe 1
Jane Doe 1